

# **EXHIBIT 2**

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**IN RE: NATIONAL COLLEGIATE  
ATHLETIC ASSOCIATION STUDENT-  
ATHLETE CONCUSSION LITIGATION**

MDL NO. 2492  
Case No. 13-cv-09116

Judge John Z. Lee

Magistrate Judge Weisman

**DECLARATION OF WILLIAM C. MULVEY OF  
GARRETSON RESOLUTION GROUP**

I, William C. Mulvey, declare as follows:

1. I am a Vice President of Garretson Resolution Group (“GRG”). On July 15, 2016, the Court appointed GRG as the Program Administrator to “administer the Second Amended Settlement in accordance with the terms and conditions of this Order and the Second Amended Settlement Agreement.” (Doc. No. 278, ¶ 13.) I make this declaration based upon my personal knowledge, and I am competent to testify as to its contents.

2. I have been asked by Settlement Class Counsel to estimate the incremental costs of the delay on the medical monitoring program administered by GRG.

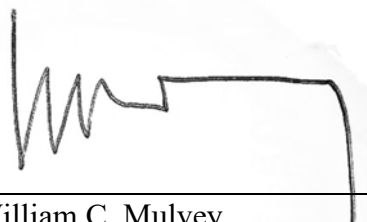
3. All other things being equal, GRG estimates that over the life of the Medical Monitoring Program a six-month delay would result in approximately \$200,000 in additional costs; a twelve-month delay would result in approximately \$370,000 in additional costs. These increases would be driven by the annual fee escalator in GRG’s billing rate schedule.

4. The estimate does not include incremental costs to the program that may result from deferring the contracting process with the medical facilities that will serve as Program Locations for the Medical Monitoring Program, although GRG generally assumes that the rates obtainable for the medical monitoring benefits will increase on a year-over-year basis, which

could result in growth of costs to the program of a similar order of magnitude (i.e. hundreds of thousands of dollars).

5. I declare under penalty of perjury under the laws of the State of Ohio that the foregoing is true and correct.

EXECUTED on this 24th day of September, 2019, at Cincinnati, Ohio.

A handwritten signature in black ink, appearing to read 'William C. Mulvey', is written over a horizontal line. The signature is stylized with a series of vertical strokes followed by a horizontal line and a final vertical stroke.

William C. Mulvey  
Vice President  
GARRETSON RESOLUTION GROUP  
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Cincinnati, OH 45140